## IN THE UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF PENNSYLVANIA

IN RE: : CHAPTER 13

ANDRI L. COUNCIL, JR.

NO. 17-12273/elf

## NOTICE OF MOTION, RESPONSE DEADLINE AND HEARING DATE

Debtor, Andri L. Council, Jr., by his counsel Bradly E. Allen has filed a MOTION TO AVOID JUDICIAL LIEN UNDER 11 U.S.C. Sec. 522(f)(1)(A) with the Bankruptcy court.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)

- 1. If you do not want the court to grant the relief sought in the motion or if you want the court to consider your views on the motion, then on or before October 13, 2017 (15 Days), you or your attorney must do all the following:
  - (a) file an answer explaining your position at

U.S. BANKRUPTCY COURT Clerks Office, Room 400 900 Market Street Philadelphia, PA 19107

If you mail your answer to the bankruptcy clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated above; and

(b) mail a copy to the movant's attorney:

Bradly E. Allen Law Office 7711 Castor Avenue Philadelphia, Pennsylvania 19152 (215) 725-4242 (215) 725-8288 (FAX)

2. If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b) above and attend the hearing, the court may enter an order granting the relief requested in the motion.

- 3. A hearing on the motion is scheduled November 7, 2017 at 1:00 p.m. to be held before the Honorable Eric L. Frank in Courtroom No. 1, United States Bankruptcy Court, 900 Market Street, Philadelphia, PA 19107.
- 4. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).
- 5. You may contact the Bankruptcy Clerk's office at 215-408-2800 to find out whether the hearing has been canceled because no one filed an answer.

Date: September 28, 2017

s/Bradly E. Allen

BRADLY E. ALLEN, ESQUIRE